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Attorney for Defendant  
REGINALD THOMAS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

REGINALD THOMAS,  
  
Defendant.

Case No.: 2:20-CR-00012 JAM

**STIPULATION AND ORDER TO  
RESET MOTION SCHEDULE**

**STIPULATION**

Defendant Reginald Thomas, by and through his counsel of record, and Plaintiff United States of America, by and through its counsel of record, hereby stipulate and request that the Motion to Dismiss hearing and Status Conference previously set for June 7, 2022, be continued to June 14, 2022 at 9:30am, with defendant's Reply brief due June 7, 2022. The defendant further agrees to waive time under the Speedy Trial Act pursuant to Local Code T4, defense preparation, up to and through the June 14, 2022 date.

In support of this stipulation, the parties request that the Court find the following:

1. By previous order, defendant's motion to dismiss was set for hearing on June 7, 2022.
2. By this stipulation, defendant now moves to continue the hearing to June 14, 2022, with defendant's reply due June 7, 2022.

- 1 3. Based upon the representations made by defense counsel, that additional time is needed  
2 to respond to the government's opposition brief, the government joins and stipulates to  
3 this request.
- 4 4. Additionally, the parties stipulate and jointly request that the Status Conference  
5 currently set for June 7, 2022, be rescheduled to June 14, 2022, so that it continues to  
6 trail the motion hearing.
- 7 5. For the purposes of calculating time under the Speedy Trial Act, 18 U.S.C. § 3161, et  
8 seq., the parties agree and request that the time period from June 7, 2022 to June 14,  
9 2022, inclusive, be excluded under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
10 upon such finding by the Court that the ends of justice served by taking such action  
11 outweigh the best interest of the public and the defendant in a speedy trial.

12  
13 IT IS SO STIPULATED.

14  
15 Dated: May 31, 2022

/s/ ETAN ZAITSU

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17 ETAN ZAITSU  
18 Counsel for Defendant  
19 REGINALD THOMAS

20  
21 Dated: May 31, 2022

PHILLIP A. TALBERT  
United States Attorney

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23 \_\_\_\_\_  
24 /s/ DENISE YASINOW  
25 DENISE YASINOW  
26 Assistant United States Attorney

**FINDINGS AND ORDER**

IT IS SO FOUND AND ORDERED this 31<sup>st</sup> day of May, 2022.

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE